

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

- v. -

KEITH RANIERE, CLARE BRONFMAN,
ALLISON MACK, KATHY RUSSELL, and
LAUREN SALZMAN,

Defendants.

No. 18-cr-204 (NGG) (VMS)

**DECLARATION OF
KATHLEEN E. CASSIDY**

KATHLEEN E. CASSIDY, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the Bar of this Court and am a partner at Hafetz & Necheles LLP, attorneys for Defendant Clare Bronfman. I am submitting this declaration in support of Ms. Bronfman's Motion to Dismiss the S-2 Indictment or in the Alternative for a Bill of Particulars, dated March 22, 2019.

2. On March 16, 2019, counsel for Ms. Bronfman sent a letter to the government requesting further particulars pursuant to Federal Rule of Criminal Procedure 7(f) and other applicable law. Attached hereto as Exhibit A is a true and correct copy of this letter.

3. On March 21, 2019, counsel for Ms. Bronfman sent an email to the government requesting additional particulars. Attached hereto as Exhibit B is a true and correct copy of this email.

4. In accordance with Local Criminal Rule 16.1, counsel for Ms. Bronfman conferred with the government in good faith. The government refused to provide any further particulars beyond identifying the names of the Jane and John Does in the S-2 Indictment.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 22, 2019
New York, New York



KATHLEEN E. CASSIDY